

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law
100 Lafayette Street, Suite 501
New York, NY 10013

Franklin A. Rothman
Jeremy Schneider
Robert A. Soloway
David Stern

Tel: (212) 571-5500
Fax: (212) 571-5507

Rachel Perillo

July 1, 2021

By ECF and EMAIL

Hon. Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Application granted.

SO ORDERED.

Re: United States v. Motley et al.,
Including AMNON FILIPPI
S2 12 Cr. 604-3 (RA)



Ronnie Abrams, U.S.D.J.
July 1, 2021

Dear Judge Abrams:

I represent Amnon Filippi, in the above-referenced matter. I write to respectfully request that your Honor authorize the early termination of Mr. Filippi's supervised release pursuant to 18 U.S.C. § 3583(e). Mr. Filippi has made two prior similar applications by letters dated July 19, 2019 (ECF Doc. 225) and July 22, 2020 (ECF Doc. 229) which the Court denied (Doc. 230). Accordingly, Mr. Filippi wishes to update the Court on his continued compliance with supervision and seeks to renew his application.

US Probation Officer Zondra Jackson has confirmed Mr. Filippi's compliance and consents to this request. AUSA Elisha Kobre likewise consents.

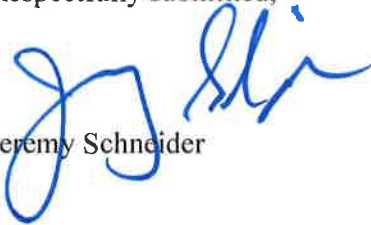
18 U.S.C. § 3583(e) provides that a Court may terminate a term of supervised release at any time after expiration of one year, "if it is satisfied that such action is warranted by the conduct of the defendant released and the interest of justice." Mr. Filippi has been out of prison since July 27, 2017.¹ He was released to a halfway house and then served a term of home confinement before formally commencing his supervised release on January 22, 2018. Thus, although Mr. Filippi has completed three-and-a-half years of supervised release, he has been out of prison for four years and has abided by all conditions and requirements during this period.

¹ The complete procedural history of Mr. Filippi's case is detailed in our July 19, 2019 and July 22, 2020 letters.

Therefore, given Mr. Filippi's continued compliance, and with the consent of both probation and the government, it is respectfully submitted that his exemplary post-release conduct and the interests of justice warrant early termination of his supervised release. *See* 18 U.S.C. § 3583(e).

If the Court has any questions regarding this application, please contact me anytime.

Respectfully submitted,



Jeremy Schneider

cc: Elisha Kobre (by ECF & email)
Assistant United States Attorney

Zondra Jackson (by email)
United States Probation Officer